

PLEASE TAKE NOTICE that, upon the Declaration of Nicholas F. Kajon, Esq. and the exhibits annexed thereto, the accompanying Memorandum of Law, and all prior papers and proceedings herein, the undersigned hereby moves, on behalf of Lee E. Buchwald, Chapter 7 Trustee of the estates of Magnesium Corporation of America and Renco Metals, Inc. (the “Appellee”), before the Honorable Denise L. Cote, United States District Judge, in Courtroom 15B of the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for an Order dismissing the appeals of (i) The Renco Group, Inc. and Ira Leon Rennert and (ii) The Ad Hoc Consortium of Renco Metals, Inc. Noteholders of the *Order Pursuant to 11 U.S.C. §§ 105 and 363, and Federal Rules of Bankruptcy Procedure 2002, 6004 and 9014 Approving Sale of Renco Litigation Interest, dated August 24, 2016* entered by the United States Bankruptcy Court for the Southern District of New York in the Chapter 7 bankruptcy case styled *In re Magnesium Corporation of America, Inc., et al.*, Bankr. Case No. 01-14312 (MKV), and granting such other and further relief as may be just and proper.

PLEASE TAKE FURTHER NOTICE that opposition to this motion shall be made in writing, filed and served in accordance with Local Civil Rules 5.2, 5.3 and 6.1, and be served upon counsel for Appellee, Stevens & Lee, P.C., 485 Madison Avenue, 20th Floor, New York, New York 10022, Attn: Nicholas F. Kajon, Esq., so as to be received on or before **October 6, 2016**.

Dated: September 21, 2016
New York, New York

STEVENS & LEE, P.C.

By: /s/ Nicholas F. Kajon
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